

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

CHANCE WILSON

Plaintiff

vs.

CONSUMER LEGAL GROUP P.C.
AND PHOENIX DEBT PROS, INC.
Defendants.

Case No. 1:24-cv-02276

JURY TRIAL DEMANDED

**REQUEST TO APPEAR TELEPHONICALLY AT SECOND
PRE-MOTION CONFERENCE**

COMES NOW Plaintiff Chance Wilson, by and through the undersigned counsel, and respectfully requests that the Court permit the undersigned counsel to appear telephonically at the hearing scheduled for the pre-motion conference scheduled for November 1, 2024 at 10:00 AM. In support thereof, counsel states that he is physically located in and has his offices in Pennsylvania, and his Co-Counsel is located in Massachusetts. Therefore, for the convenience of counsel, the undersigned respectfully requests leave to appear telephonically and/or virtually at the pre-motion conference, as it has in the past.

Counsel for the Plaintiff has conferred with counsel for the Defendant, who does not oppose the relief sought.

CONCLUSION

WHEREFORE, for the reasons set forth herein, the Plaintiff respectfully requests that the undersigned counsel be permitted to appear telephonically and/or virtually for the upcoming November 1 pre-motion conference.

RESPECTFULLY SUBMITTED AND DATED this October 7, 2024.

/s/ Andrew Roman Perrong
Andrew Roman Perrong, Esq.
(Pro Hac Vice)
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CERTIFICATE OF SERVICE

I certify that I filed the foregoing via ECF on the below date, which will automatically send a copy to all attorneys of record on the case.

Dated: October 7, 2024

/s/ Andrew Roman Perrong
Andrew Roman Perrong, Esq.
(Pro Hac Vice)
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